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REMARKS

Claims 1-16 are pending in the application. The Examiner has rejected Claims 1-3 and 12-16 under 35 USC 102(e) as being anticipated by Du; has rejected Claims 4-5 under 35 USC 103(a) as being unpatentable over Du in view of Dong; and, has rejected Claims 9, 10 and 11 under 35 USC 103(a) as unpatentable over Du in view of Kraft. The Examiner has indicated that Claims 6-8 are objected to and would be allowable if rewritten. Applicants are not submitting amendments to Claims 6-8 at this time, since Applicants believe that the claims from which they depend are allowable, as set forth below. Applicants have submitted amendments to the independent claims, to improve the readability thereof and to more appropriately provide antecedent basis for the term "said activity".

The present invention is directed to a system, program storage device, and method for managing workload within a Workflow-Management-System (WFMS), the method being executable by the WFMS on at least one computer system, wherein the WFMS comprises a process model comprising one or more activities as the nodes of an arbitrary graph, with

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directed edges of the graph defining a potential control
flow within the process model. The method comprises the
steps of analyzing the process model to determine if a
priority execution indicator is assigned to one or more of
the activities within said process model; and when the
analyzing step indicates that there is a priority execution
indicator for an activity, the WFMS launching execution of
the activity with an execution priority specified according
to the priority execution indicator.

The Examiner has cited the Du patent as the primary
reference against the pending claims. The Du patent details
a system and method for performing flexible workflow process
execution in a distributed workflow system. Under the Du
teachings, the OpenPM engine 20 functions as a set of state
machines. As expressly taught in the cited passage from
Col. 7, lines 45-54, the "OpenPM engine 20 steps through the
modes in the directed graph 40...according to the order
specified in its workflow process definition." As each node
is addressed, the available state machine at the node checks
its priority queue to see if a request is pending (see: Col.
13, lines 5-10). The priority queues are managed by the

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queue manager 67 "...to facilitate message dispatching between modules" (see: Col. 12, lines 58-60).

Applicants respectfully assert that there is nothing in the Du patent which teaches or suggests the invention as claimed. Applicants first note that the claim language is very specific to a WFMS which is a process model comprising one or more activities as the nodes of an arbitrary graph, with directed edges of the graph defining a potential control flow within the process model. The potential control flow is not necessarily followed, however, depending on the claimed analyzing of activities to determine if there is an priority execution indicator for the activity. Under the present invention, activities with a priority execution indicator, or a priority execution specification, are launched out of order depending on the specified execution priority. The Du patent does not perform this analysis and launching. Rather, as expressly taught by Du at Col. 7, lines 45-54, the Du engine "steps through the nodes in the directed graph in the order specified in its workflow." Du does not analyze activities for priority execution indicators, but simply steps through the nodes in a predetermined order.

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Applicants further assert that Du provides no teaching
or suggestion of a priority execution indicator for an
activity. What Du teaches is that a queue manager places
messages/requests in queues at the nodes, as noted in Col.
12, lines 58-60 with no detail provided as to how the queue
manager determines priority of requests. The nodes in Du
are not activities with priority execution indicators.
Rather, the Du nodes are execution units for handling queued
requests. Clearly the Du patent is not teaching or
suggesting the invention as claimed.

It is well established under U.S. Patent Law that, for
a reference to anticipate claim language under 35 USC 102,
that reference must teach each and every claim feature.
Since the Du patent does not teach a process model
comprising one or more activities as the nodes of an
arbitrary graph, with directed edges of the graph defining a
potential control flow within the process model; does not
teach analyzing the process model to determine if a priority
execution indicator is assigned to one or more activities
within the process model; and, does not teach launching
activities in accordance with the specified execution
priority, it cannot be maintained that the Du patent

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anticipates the claim as expressly recited in the independent claims, Claims 1, 14, 15, and 16. It is also well established that a reference which does not anticipate an independent claim cannot be said to anticipate claims which depend therefrom and add limitations thereto. Accordingly, Claims 2-5 and 9-13 are not anticipated by the teachings of the Du patent.

Claims 4 and 5 have been rejected under 35 USC 103 as unpatentable over the teachings of Du in view of Dong. The Du patent has been discussed above and Applicants rely on those arguments without repeating same. The Examiner has stated that Dong discloses a workflow comprising a priority execution specification. Applicants respectfully disagree. The Dong patent looks at task characteristics (e.g., "task unneeded" or "task necessary") or properties which will enhance overall performance, so that processing will not be held up unnecessarily pending execution of "necessary tasks". The Dong teachings do not, however, teach that the task characteristics are activity priority values nor do they obviate the additional level of priority specification which is taught by the present application.

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In page 13, lines 15-23 and in page 14, lines 3-12, the present specification expressly teaches that multiple priority values can exist, for an activity, a performance sphere, and a process model. The priority value for an activity will take precedence over that of the activity's sphere; and, the priority value for a performance sphere will take precedence over that of the process model. Claims 4 and 5 recite determining if a priority execution specification is associated with the activity and assigning the priority execution indicator based on the activity's priority execution specification.

Applicants respectfully submit that the combination of Du and Dong does not obviate the claim language. To modify Du with Dong, one would modify the queue manager to utilize the Dong task characteristic when dispatching messages to modules. One would not arrive at a method wherein a process model is first analyzed for a priority execution indicator and further analyzed for a priority execution specification just for the activity. Absent some teachings of analysis of a process model, determining if one or more priority values exist, assigning the determined priority value to the activity, and launching execution of the activity according

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to the priority value, it cannot be maintained that the combination of Du and Dong obviates the invention as set forth in the pending claims.

Claims 9-11 have been rejected under 35 USC 103 as being unpatentable over the teachings of Du in view of Kraft. The distinctions over Du recited above are relied upon herein. The Examiner has additionally cited the Kraft patent which teaches, in Columns 7-9, that an application may have a process-id of an X application but must move it to another workspace for which it does not have a process-id. Under the Kraft teachings at Col. 9, lines 7-10, the application will be re-prioritized. Applicants respectfully assert that the Kraft teachings of re-prioritizing clearly do not obviate the invention as claimed. Claims 9-11 recite that the launching comprises mapping the priority execution indicator to a value based on either the execution environment (Claims 9 and 10) or the communication system (Claim 11). Mapping the priority execution indicator is not the same as Kraft reprioritizing due to the lack of an appropriate workspace process-id.
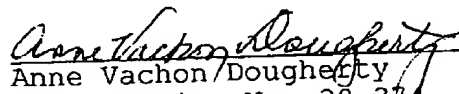
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  Based on the foregoing amendments and remarks, Applicants respectfully request entry of the amendments, withdrawal of the rejections, and issuance of the claims.

        Respectfully submitted,

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